

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of:

The Development of Operational, Technical)
And Spectrum Requirements For Meeting) WT Docket No. 96-86
Federal, State and Local Public Safety Agency)
Communications Requirements Through the)
Year 2010)

Comments of the City of Tulsa, Oklahoma
In Support of Motorola's Petition for Reconsideration

The City of Tulsa, Oklahoma is pleased to submit comments in support of Motorola's Petition for Reconsideration urging the Commission to reconsider certain elements of the Commission's Fifth Report and Order in the above referenced proceeding.

The City of Tulsa is responsible for mission critical communications that support over 1,300 sworn officers, fire fighters and emergency services providers. The first responders provide for the safety of life and property of over 250,000 citizens of our city. Our communications currently use 800 MHz channels and we are depending on the 700 MHz channels in order to expand these systems.

Tulsa is very concerned that the Commission's mandate banning 12.5 kHz licenses after December 31, 2006 and our subsequent ability to purchase 12.5 kHz equipment will restrict our ability to expand our 800 MHz system into the 700 MHz band. Further, the Commission also mandated that for those agencies that have applied for 700 MHz licenses prior to December 31, 2006 cannot purchase 12.5 kHz only equipment after that date. This means that if we can get Region 34 plans developed, submitted and approved by the Commission prior to that date, we will be required to purchase dual mode 12.5 and 6.25 kHz equipment. This creates a concern that the 6.25 kHz mode will limit our ability to expand our 800 MHz system, and that, in addition, our city will incur the additional cost of purchasing dual mode 700 MHz radios to meet the Commission's mandate.

The City of Tulsa agrees with Motorola's petition and urges the Commission to reconsider these mandates and eliminate or at minimum postpone until the end of 2011 its mandate that takes away public safety's ability to choose the solution that best fits our needs. 6.25 kHz equivalent standards are still being developed and we will not know what products will be available to meet our mission critical requirements until manufacturers then design and market such products upon the completion of the

standards. This means that we will be putting first responders' safety into the hands of yet to be developed 6.25 kHz solutions. Tulsa urges the Commission to recognize that it is very premature to mandate such solutions as the only choice for public safety in this much-needed spectrum. Public safety must have time to evaluate and test this yet to be developed technology in the field. Once 6.25 kHz equivalent technology becomes available, we will be happy to have it as an option, but we ask the Commission not to force it as the only option, or to make it a mandated requirement in all radios after December 31, 2006.

Sincerely,

April 1, 2003